



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

March 27, 2018

Elizabeth Adams  
Environmental Protection Agency, Region 9  
75 Hawthorne Street, Air-1  
San Francisco, CA 94105

Re: Initial Notification of Intent to Pursue Wildfire-Ozone Exceptional Events for June 20, 2015, and July 7, 2017

Dear Ms. Adams:

Arizona Department of Environmental Quality (ADEQ) is hereby submitting our Initial Notification of Intent to Pursue Wildfire-Ozone Exceptional Events for June 20, 2015 and July 7, 2017. The Maricopa County, Phoenix-Mesa area is currently designated moderate nonattainment for the 2008 ozone NAAQS. Nonattainment areas nationwide are required to meet the 2008 ozone standards by their statutory attainment date, July 20, 2018. In preparation for this, ADEQ analyzed air quality data for years 2015-2017 to determine potential attainment. The area would have achieved a maximum design value of 0.075 ppm, save for two wildfire-related Exceptional Events that lead to ozone exceedances on June 20, 2015 and July 7, 2017. ADEQ is currently collaborating with Maricopa County Air Quality Department (MCAQD) and Maricopa Association of Governments (MAG) to develop demonstrations for both events. ADEQ aims to submit these demonstrations to EPA before the July 20, 2018 attainment deadline.

The Phoenix-Mesa area will meet the 2008 ozone NAAQS should EPA concur on both above mentioned exceptional events. Under the Clean Air Act, EPA is required to reclassify those areas that do not meet their statutory attainment date within six months (January 20, 2019). ADEQ is submitting these initial notifications to provide the necessary data and information to avoid EPA unnecessarily reclassifying the Phoenix-Mesa area as Serious for the 2008 ozone NAAQS. ADEQ will seek a Clean Data Finding should EPA concur on the Exceptional Events. ADEQ will then submit to EPA a maintenance State Implementation Plan and a request to re-designate the Phoenix-Mesa area to maintenance/attainment.

Sincerely,

Timothy Franquist, Jr., Director  
Air Quality Division

Cc: Jennifer Williams, EPA  
Michael Flagg, EPA  
Gwen Yoshimura, EPA  
Meredith Kurpius, EPA  
Matt Poppen, MAG  
Lindy Bauer, MAG  
Hether Kraus, Maricopa County